

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ALDO VERA, JR., as Personal Representative
of the Estate of Aldo Vera, Sr.,

Plaintiff,

v.

THE REPUBLIC OF CUBA,

Defendant.

Case No. 12-CV-01596
(AKH)

ALDO VERA, JR., as Personal Representative
of the Estate of Aldo Vera, Sr.; and

JEANETTE FULLER HAUSLER, and WILLIAM FULLER as
court-appointed co-representatives of the ESTATE OF ROBERT
OTIS FULLER, deceased, on behalf of all beneficiaries of the
Estate and the ESTATE OF ROBERT OTIS FULLER; and

ALFREDO VILLOLDO, individually, and
GUSTAVO E. VILLOLDO, individually and as Administrator,
Executor, and Personal Representative of the ESTATE OF
GUSTAVO VILLOLDO ARGILAGOS,

Petitioners,

v.

BANCO BILBAO VIZCAYA ARGENTARIA (S.A.); BANK OF
AMERICA N.A.; BANK OF NEW YORK MELLON;
BARCLAY'S BANK PLC; CITIBANK N.A.; CREDIT SUISSE
AG, NEW YORK BRANCH; DEUTSCHE BANK TRUST
COMPANY AMERICAS; HSBC BANK (HSBC BANK USA,
N.A.); INTESA SANPAOLO S.P.A.; JP MORGAN CHASE
BANK, N.A.; RBS CITIZENS, N.A.; ROYAL BANK OF
CANADA; SOCIETE GENERALE; UBS AG; WELLS FARGO
BANK, N.A.; BROWN BROTHERS HARRIMAN & CO.;
MERCANTIL COMMERCEBANK, N.A.; STANDARD
CHARTERED BANK; AND BANCO SANTANDER, S.A.,

Respondents/Garnishees.

**DECLARATION OF
ANDREW C. HALL IN
SUPPORT OF
MOTION FOR
SUMMARY
JUDGMENT**

HSBC BANK USA, N.A.,

Garnishee-Respondent and Third-Party Petitioner,

v.

BANCO BILBAO VIZCAYA ARGENTARIA, S.A.,
BANCO INTERNACIONAL DE COMERCIO, S.A. AND
INGO BANK FRANCE, SUCCURSALE DE ING BANK N.V.,

Adverse Claimants-Respondents

ANDREW C. HALL hereby declares:

1. I am lead counsel to Alfredo Villoldo, individually, and Gustavo E. Villoldo, individually and as Administrator, Executor, and Personal Representative of the Estate of Gustavo Villoldo Agrilagos, Petitioners in this judgment enforcement proceeding.

2. The facts set forth herein are based on my review of the records that are referenced below and attached hereto.

3. I submit this declaration in support of Petitioners' Motion for Summary Judgment.

4. Attached to this declaration are true and correct copies of the following exhibits referenced in Petitioners' Memorandum in Support of Motion for Summary Judgment:

Exhibit 1: Deferred Prosecution Agreement entered into between the United States and ING Bank

Exhibit 2: Stipulated Statement of Facts between the United States and ING Bank

Exhibit 3: Cuban Decree-Law No. 172

Exhibit 4: Deferred Prosecution Agreement entered into between the United States and HSBC Bank USA

Exhibit 5: Affidavit of Prof. Jamie Suchlicki

I declare under penalty of perjury that the foregoing is true and correct.

Dated: Miami, Florida
June 23, 2015



Andrew C. Hall